



# APC

## ALPHA PRIME CORPORATION SARL

SURVEILLANCE & PROTECTION 24/7

# CORPORATE POLICIES

Version 2.0 · English version — translation; the French version prevails

1. Anti-Corruption & Due Diligence
2. Supplier & Subcontractor Management
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4. Whistleblowing
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6. Recruitment & Conflict of Interest

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**Private security authorisation (agrément)** N°000672/MISP/AT/DGAPJ/DAJ-R

**RCCM / NIF** NE-NIM-01-2020-B13-01859 / 66941/R

**Ref.** APC/POL/2026-001

**Effective date** 08/10/2026 — supersedes the version of 2 June 2026

**Approved by** MAHAMANE SORY DIALLO — Gérant (Managing Director)

## 00 General Provisions

1. **Scope.** These policies apply to the Gérant, managers, employees, agents, subcontractors and suppliers of APC.
2. **Regulatory framework.** APC operates under Décret n°2025-072/P/CNSP/MI/SP/AT of 7 February 2025 regulating the activities of private security companies in Niger, the Niger Labour Code and applicable law. Where a policy conflicts with the law, the law prevails.
3. **Disciplinary measures.** Any disciplinary measure referred to in these policies is applied in accordance with the Labour Code, the employment contract and APC's internal regulations (règlement intérieur). The employee's right to be heard is guaranteed.
4. **Mandatory reporting to authorities.** Nothing in these policies limits the legal duty of personnel to report crimes and offences without delay to judicial police officers or the Public Prosecutor (Décret 2025-072, Art. 27). Internal reporting is in addition to that duty, never instead of it.
5. **Confidentiality.** Information obtained in the course of duty may only be disclosed to APC, its clients or their legal representatives, except where the law requires otherwise (Art. 28).
6. **Personal data.** Personal data collected under these policies (identity checks, criminal record extracts, reports) is processed only for the stated purpose, kept secure, accessible only to authorised persons, and handled in accordance with Niger personal data protection law.
7. **Reporting channels.**

|                  |                                            |                   |                  |
|------------------|--------------------------------------------|-------------------|------------------|
| <b>Channel A</b> | MAHAMANE SORY DIALLO, Gérant               | info@apcsec.com   | +227 96 97 61 54 |
| <b>Channel B</b> | Moctar GUIMBA, Ethics & Compliance Officer | ethics@apcsec.com | +227 96 73 65 18 |

Channel B is mandatory for any report concerning the Gérant, and open to any reporter who prefers it.

8. **Languages.** These policies are issued in French, English and Chinese. In case of discrepancy, the French version prevails.

## 01 Anti-Corruption & Due Diligence

### ZERO TOLERANCE

No covered person may offer, promise, give, request or accept any bribe, facilitation payment or improper advantage. This applies directly or through an intermediary, and to dealings with public officials or private persons.

### GIFTS AND HOSPITALITY

- Every gift or hospitality offered or received is recorded in the gifts register.
- Gifts above **USD 50 (or the equivalent in FCFA)** are refused or returned.
- Cash and cash equivalents are always refused.
- No gift may be given or accepted during a tender or contract renewal with the counterparty concerned.

**DUE DILIGENCE**

- Clients, suppliers and partners are verified before engagement: registration, ownership, and screening against UN Security Council consolidated sanctions lists and applicable debarment lists.
- Every financial transaction is documented. Every payment order carries a sequential reference and is recorded in APC's payment-order register.
- Contracts are reviewed before signature.

**REPORTING**

Through Channel A or Channel B. Retaliation against good-faith reporters is prohibited.

**CONSEQUENCES**

Disciplinary action under General Provision 3, up to and including dismissal; termination of the contractual relationship; referral to the competent authorities.

**02 Supplier & Subcontractor Management**

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**SELECTION CRITERIA**

- Legal registration and compliance with applicable law.
- Demonstrated technical capacity.
- Fair labour practices.
- Financial stability.
- Zero tolerance for corruption, forced labour, child labour and modern slavery.

**SECURITY SUBCONTRACTING**

APC does not subcontract any private security activity (guarding, protection of persons, transport of funds) to an entity that does not hold its own authorisation from the Minister in charge of public security. APC's authorisation is personal and non-transferable (Décret 2025-072, Art. 10).

**CONTRACTUAL CLAUSES**

Every supplier contract includes clauses on ethics, labour standards, anti-corruption, confidentiality and the right to audit. Where APC uses transport or logistics suppliers, the engagement is covered by a written agreement including these clauses.

**INSURANCE**

APC holds civil liability insurance covering damage caused by its activities (Décret 2025-072, Art. 52).

**MONITORING**

Supplier performance and compliance are reviewed at least once a year. Any non-conformity is escalated to the Gérant and corrected within 30 days, failing which the contract is terminated.

## 03 Safeguarding & Protection from Sexual Exploitation and Abuse (PSEA)

### COMMITMENTS

- APC does not tolerate abuse, exploitation or harm to any person in contact with its operations.
- APC applies the standards of the UN Secretary-General's Bulletin ST/SGB/2003/13 and the UN Supplier Code of Conduct: sexual exploitation and abuse are prohibited; exchanging money, employment, goods or services for sex is prohibited; sexual activity with any person under 18 is prohibited, whatever the local age of majority.
- **Child labour.** APC employs no one under 18. The minimum age for security personnel is 20 (Décret 2025-072, Art. 20).
- **Respect for the law and for persons.** Personnel do not interfere in labour disputes; do not monitor private life or political, religious or trade union opinions; use force only in legitimate self-defence (Art. 4 and 45).

### REPORTING

Any concern is reported immediately through Channel A or Channel B. A crime or offence is also reported to the authorities (General Provision 4). Survivors' confidentiality and wellbeing take priority.

### INVESTIGATION AND MEASURES

Allegations are investigated promptly. The person concerned may be suspended as a precaution during the investigation, in accordance with the Labour Code. Substantiated allegations lead to dismissal and referral to the competent authorities. APC cooperates fully with investigations by clients and authorities.

## 04 Whistleblowing

### WHAT CAN BE REPORTED

- Corruption, fraud or theft.
- Safeguarding and sexual exploitation and abuse concerns.
- Forced labour.
- Breaches of these policies, of Décret 2025-072 or of any other law.

### HOW TO REPORT

- Channel A or Channel B, in person, by email (marked CONFIDENTIAL) or by phone.
- Anonymous written reports are accepted.

### HANDLING

- Reports are acknowledged within 5 working days and investigated within 30 days.
- The reporter's identity is protected.
- A person implicated in a report takes no part in handling it.

## PROTECTION

Retaliation against a good-faith reporter is a disciplinary offence. Knowingly false reports may also lead to disciplinary action.

## LEGAL DUTY PRESERVED

Internal reporting does not replace the duty under Article 27 to report crimes and offences to judicial authorities.

## 05 Anti-Bullying & Harassment

### COMMITMENTS

- APC provides a workplace free from bullying, harassment, discrimination and intimidation.
- Workers are treated with dignity. Physical or psychological violence and unlawful financial deductions from pay are prohibited (Décret 2025-072, Art. 26).
- Staff receive training on respectful conduct.
- Site supervisors are responsible for maintaining respectful conduct on their sites.

### COMPLAINTS

Made to the supervisor, through Channel A, or through Channel B where the Gérant is concerned. Handled confidentially and investigated within 15 working days.

### CONSEQUENCES

Disciplinary action under General Provision 3, up to and including dismissal.

## 06 Recruitment & Conflict of Interest

### PRINCIPLES

- Recruitment is fair, transparent and based on merit and suitability.
- No discrimination on grounds of sex, religion, ethnicity or origin, **subject to the legal requirements below.**
- Every employee receives a written employment contract before starting work.
- Employees are assigned only to the work agreed in their contract (Art. 23).

### LEGAL ELIGIBILITY REQUIREMENTS (DÉCRET 2025-072, ART. 20-21)

All administrative, supervisory and operational staff must:

- be at least 20 years old;
- have no final criminal conviction for offences against persons or property;
- be of good character;
- not have been struck off the Defence and Security Forces.

Former Defence and Security Forces personnel must also produce a certificate of good conduct. Foreign nationals must meet the additional conditions of Article 20.

## STAFF FILE

For each employee, APC keeps: certified copies of the birth certificate, national identity card and nationality certificate; a residence certificate; four photographs; a recent criminal record extract (bulletin n°3).

## STAFF COMPOSITION

In accordance with Article 51, at least one third of APC's personnel are former Defence and Security Forces personnel who have definitively left active service.

## TRAINING AND HABILITATION

Personnel are trained by a State-approved training centre and obtain the habilitation provided for in Article 49 before being deployed.

## REGULATORY DECLARATIONS

- Every hiring and every dismissal is declared to the Ministry in charge of public security within 30 days (Art. 24).
- The updated staff list is sent to the Ministry every quarter (Art. 25).

## CONFLICT OF INTEREST

- Every employee declares any personal interest that could conflict with APC's interests, including family relationships with clients, suppliers or competitors.
- Financial interests in a company that does business with APC must be declared; the Gérant decides on the measures required.
- Failure to declare is a disciplinary offence.

## RECORDS

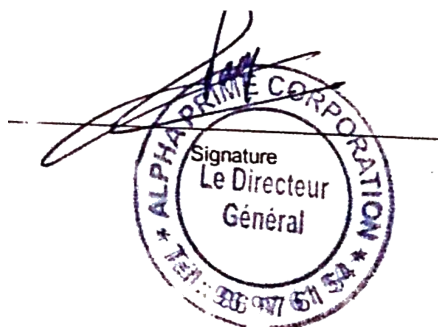
Recruitment files are kept for the duration of employment and five (5) years after it ends, or longer where the law requires.

## AUTHORISATION

The Gérant approves these policies, which take effect on the date below and bind all persons referred to in General Provision 1.

### MAHAMANE SORY DIALLO

Gérant (Managing Director)  
Alpha Prime Corporation SARL  
Date : 08/10/2026  
Signature and stamp



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authenticity  
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